

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

Van's Aircraft, Inc.,
Debtor.

Case No. 23-62260-dwh11

Claim No. 248

RESPONSE TO OBJECTION OF CLAIM

Claimant: Edgardo Gomez

Amount of Claim: \$35,344.87

Honorable Judge:

I, Edgardo Gomez, the claimant in the above-referenced matter, hereby submit this response to the Debtor's objection to my claim.

I assert that my claim is valid for the following reasons:

- **Modified Order:** I paid the full amount for a finishing kit under the terms of the original agreement with Van's Aircraft and it was never delivered. Under the bankruptcy proceedings, I was forced to agree to new terms not to lose my payment for the finishing kit and my complete investment in the project.
- **Laser cut parts:** Van's Aircraft Inc. Still does not have an engineering fix for difficult to replace parts. Replacing laser cut parts already built into an assembly will cause more damage, time and expenses that Van's is not covering. Please see Van's recommended parts for replacement list (Highlighted in red) and Van's website question and answer section.
- **Books and records:** The amount of my claim is consistent with the payments made to Van's Aircraft Inc. For an RV-8 aircraft kit. I consider the present situation brought on by failure in management to have created a loss in value for aircrafts under the laser cut program.

For the reasons stated above, I respectfully request that the Court overrule the Debtor's objection and allow Claim No. 248 in the full amount of \$35,344.87.

I am prepared to provide any additional documentation or testimony the Court may require to support my claim.

Respectfully submitted,



Edgardo Gomez
PO. BOX 1392
Temecula, CA. 92593
714-349-7120

I certify that on August 27, 2024, copies of a written response to the claim objection were mailed to:

Timothy J. Conway Attorney for debtor at Tonkon Torp LLP, 888sw Fifth Ave, Ste. 1600, Portland, OR 97204.

Van's Aircraft Inc. Attn: Tammy Flores, 14401 Keil Rd. NE, Aurora, OR 97002

The Office of the US. Trustee, 1220 SW 3rd Ave, Rm. 315, Portland OR. 97204

The Subchapter V trustee, Mr Kenneth S. Eiler, 515 NW. Saltzman Rd, PMB 810, Portland , OR 97201



Signature of person doing the mailing